

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	
ROSS INTELLIGENCE INC.,	)	<b>PUBLIC VERSION</b>
	)	
Defendants/Counterclaimant.	)	

**DECLARATION OF JACOB CANTER IN SUPPORT  
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S BRIEFS IN  
RESPONSE TO PLAINTIFFS' MOTIONS FOR SUMMARY JUDGMENT**

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*Attorneys for Defendant/Counterclaimant ROSS  
Intelligence, Inc.*

Dated: January 30, 2023  
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**DECLARATION OF JACOB CANTER IN SUPPORT  
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.’S BRIEFS IN  
RESPONSE TO PLAINTIFFS’ MOTIONS FOR SUMMARY JUDGMENT**

I, Jacob Canter, declare as follows:

1. I am employed as a lawyer at Crowell & Moring, LLP, counsel of record for ROSS Intelligence, Inc. I am an attorney, admitted to the bar of the states of California and District of Columbia and have been admitted *pro hac vice* to appear before this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.’s (“ROSS”) Responses to Plaintiff/Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation’s (“Plaintiffs”) Motions for Summary Judgment.

2. A true and correct copy of an excerpt from, “The Economic Structure of Intellectual Property Law,” by William M. Landes and Richard A. Posner (2003) is attached to this declaration as **Exhibit 67**.

3. A true and correct copy of an excerpted compilation of local rules from various districts requiring use of Westlaw, is attached to this declaration as **Exhibit 68**.

4. A true and correct copy of excerpts from the Deposition Transcript of Laurie Oliver (Mar. 30, 2022) is attached to this declaration as **Exhibit 69**.

5. A true and correct copy of JCaRE Background, TR-0036336 is attached to this declaration as **Exhibit 70**.

6. A true and correct copy of excerpts from the Deposition Transcript of Tariq Hafeez (May 26, 2022) is attached to this declaration as **Exhibit 71**.

7. true and correct copy of excerpts from the Deposition Transcript of Teri Whitehead (Apr. 18, 2022) is attached to this declaration as **Exhibit 72**.

8. A true and correct copy of excerpts from the Deposition Transcript of Andrew Arruda (Mar. 30, 2022) is attached to this declaration as **Exhibit 73**.

9. A true and correct copy of an email from Andre Garber (Jul. 21, 2015) attaching Westlaw Canada Terms and Conditions, ROSS-023032254, is attached to this declaration as **Exhibit 74**.

10. A true and correct copy of excerpts from the Deposition Transcript of Cameron Tario (Apr. 27, 2022) is attached to this declaration as **Exhibit 75**.

11. A true and correct copy of excerpts from the Deposition Transcript of Mark Hoffman (Mar. 16, 2022) is attached to this declaration as **Exhibit 76**.

12. A true and correct copy of Vetting Customers – High Usage and Competitors, TR-0908413, is attached to this declaration as **Exhibit 77**.

13. A true and correct copy of an email from Julie Smith regarding LegalEase Solutions (Jan. 11, 2018), TR-0037754, is attached to this declaration as **Exhibit 78**.

14. A true and correct copy of excerpts from the Deposition Transcript of Erik Lindberg (Mar. 22, 2022) is attached to this declaration as **Exhibit 79**.

15. A true and correct copy of excerpts from the Deposition Transcript of Andrew Martens (Mar. 25, 2022) is attached to this declaration as **Exhibit 80**.

16. A true and correct copy of the Master Services Agreement (Oct. 15, 2015), TR-0038909, is attached to this declaration as **Exhibit 81**.

17. A true and correct copy of Plaintiffs' Responses and Objections to ROSS's First Set of Requests for Admission (Nos. 1-129) is attached to this declaration as **Exhibit 82**.

18. A true and correct copy of excerpts from the Deposition Transcript of Tomas Van der Heijden (Mar. 17, 2022) is attached to this declaration as **Exhibit 83**.

19. A true and correct copy of excerpts from the Deposition Transcript of Charles Von Simson (Apr. 19, 2022) is attached to this declaration as **Exhibit 84**.

20. A true and correct copy of a letter to Tariq Hafeez from Mark Haddad (Jan. 4, 2018), TR-0002723, is attached to this declaration as **Exhibit 85**.

21. A true and correct copy of an email from Julie L. Smith regarding Response Required: User with excessive session activity – 1003665388 LegalEase Solutions (Nov. 28, 2017) TR-0179804, is attached to this declaration as **Exhibit 86**.

22. A true and correct copy of an email from Julie L. Smith regarding Response Required: User with excessive session activity – 1003665388 LegalEase Solutions (Nov. 17, 2017) TR-0037703, is attached to this declaration as **Exhibit 87**.

23. A true and correct copy of an email from Cameron Tario regarding Ancillary Block, LegalEase Solutions (Nov. 27, 2017) TR-0038692, is attached to this declaration as **Exhibit 88**.

The Spreadsheet

24. To respond to Plaintiffs' Partial Motion for Summary Judgment on Copyright Infringement, I reviewed Plaintiffs' Exhibit 21, which is a spreadsheet. [REDACTED]

[REDACTED]

25. To reflect the work completed in relation to Plaintiffs' Exhibit 21, I have prepared an exact copy of Plaintiffs' Exhibit 21 [REDACTED]

[REDACTED]

[REDACTED] attached herein as **Exhibit 89**.

26. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

27.

28.

29.

30.

31.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

32.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

33.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Francisco, California on January 30, 2023.

/s/ Jacob Canter

Jacob Canter

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